

## RESPONSE TO COMMENTS

City of McCall, Idaho  
NPDES Permit No. ID-002023-1  
Public Comment Period:

During the public comment period specified above, only the city submitted comments. This document summarizes the comments and the EPA responses to the comments.

1. Comment: The city is concerned that Section I.A.1, paragraph 2 may regulate the city's land application of wastewater which is controlled solely by the State of Idaho and a consent order between the city and the IDEQ. We suggest this provision state that the permit does not regulate the land application of the city's effluent.

Response: Section I.A.1 has been modified to clarify when the reference is to land application practices and when the reference is to surface water discharges.

2. Comment: The proposed permit would allow an emergency discharge between December 1 and May 31. Irrigators have started pumping as early as June 1 only once in the five years that the irrigation system has been in operation. Given that a later start to the irrigation season is normally driven by high spring precipitation, the ability to select the time to begin an emergency discharge accordingly would have less of an impact given the higher river flows that accompany the precipitation. In addition, the highest flow of the NFPR in McCall due to the spring runoff occurs around Memorial Day, further minimizing the potential impacts that a discharge can create. Section I.A.3.a should be modified to allow discharge after May 31 if conditions necessitate.

Response: The Consent Order between IDEQ and the city is the basis for the emergency discharge period contained in the draft permit. The state's 401 certification letter dated January 22, 2003, extends the emergency discharge period to June 30. The final permit reflects this extended emergency discharge window.

3. Comment: The pH of the proposed permit is 6.5 to 9.0. The low end of the previous discharge permit was 6.0. The reason for the low pH in our previous permit was that the pH of the water as it leaves the sand filters is often below 6.0. This same issue was brought up in the previous permit application when the lower 6.0 level was approved. A lower pH improves other aspects of the treatment. Completely filtered water from our system is very low in suspended solids and BOD as well as lower in phosphorus and ammonia. A pH limit of 6.0 will force the city to mix unfiltered water to raise the pH, but will also raise

all of the other values. We would hope that the levels previously approved would remain in effect for the stated reasons.

Response: The IDEQ certification letter maintains the 6.5 to 9.0 pH limitations as necessary to meet water quality standards. No change has been made in the final permit.

4. Comment: Under the Consent Agreement between the city and IDEQ, the city is required to obtain a median total coliform concentration of no more than 2.2 colonies per 100 milliliters at some point in the treatment train prior to being applied to the land application site. It is our expectation that the water quality in the storage lagoon will be better than the day-to-day effluent from the wastewater treatment facility. We request that EPA and the state of Idaho allow discharge from the lagoon facility without imposing an E. coli bacteria limit in recognition of the bacterial requirement contained in the Consent Agreement.

Response: The IDEQ certification letter maintains an effluent limitation for E. coli of 126/100 ml (average monthly limit geometric mean), and 406/100 ml (daily maximum limit) for emergency discharge to the NFPR. No change has been made in the final permit.

5. Comment: The requirement of 85% removal [BOD and TSS] ... is difficult to meaningfully calculate since the detention time in the storage lagoon may be as much as nine months. The 85% removal requirement is quite meaningless and should be removed except when directly discharging from the wastewater treatment facility and not the winter storage lagoon.

Response: Further discussions with the city's consulting engineer have clarified that emergency discharges from the storage lagoon would always be co-mingled with effluent from the treatment process prior to discharge through the multi-port diffuser. The average amount of storage reservoir water would be 1.73 mgd of a design flow of 4.75 mgd. Based on a letter from the city, the maximum possible discharge from the storage lagoon is 3.6 mgd. Since there will be no discharge of strictly storage reservoir water, the percent removal requirement is retained in the final permit.

6. Comment: The city is concerned that the permit does not adequately address emergency discharge scenarios like natural disasters, terrorist acts, sudden or unknown increases in I&I or precipitation that could overtop the storage facility, or an unforeseen condition that would disallow land application through the J-Ditch pipeline. Specifically, the term "upset" as defined, does not adequately address

the unique situation McCall's facility may face.

Response: The EPA disagrees; the definition says an upset is an "exceptional incident...."  
We believe all of the scenarios presented by the city could be included in this definition. The final permit has not been changed.

In addition to the issued addressed above, the state's certification letter required that the sample frequency during emergency discharge to the river be changed to daily for all parameters for both effluent and river monitoring. This change has been made in the final permit.